

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

P. VAN HOVE BVBA, PASCAL VAN HOVE
GCV, JOHN THOLLON, MICHAEL
ZABINSKI, JEAN DOYLE, AND MARK
LAROSA, INDIVIDUALLY AND ON BEHALF
OF ALL OTHERS SIMILARLY SITUATED,

Plaintiff,

vs.

UNIVERSAL TRAVEL GROUP, INC.,
JIANGPING JIANG, YIZHAO ZHANG, JIANG
XIE, JIDUAN YUAN, LAWRENCE LEE,
LIZONG WANG, DAVID T. SVOBODA, AND
ACQUAVELLA, CHIARELLI, SHUSTER &
CO., LLP,

Defendants.

CASE No.: 2:11-cv-2164 (KM)
(MCA)

**STIPULATION AND
~~PROPOSED~~ ORDER STAYING
ACTION**

CLASS ACTION

WHEREAS, on May 1, 2014, plaintiffs P. Van Hove BVBA, Pascal Van Hove GCV, John Thollon, Michael Zabinski, Jean Doyle, and Mark Larosa (“Plaintiffs”) filed their Second Amended Complaint for Violation of the Securities Laws (the “Complaint”), bringing claims under the federal securities laws against (among others) Universal Travel Group, Inc., Jiangping Jiang, and Jing Xie (the “the UTG Defendants”);

WHEREAS, on June 27, the UTG Defendants filed a motion to dismiss the Complaint, and a motion to strike certain of its allegations (the “Motions”);

WHEREAS, Plaintiffs’ opposition to the motion to dismiss is currently due on August 1, 2014;

WHEREAS, on July 1, 2014, the Securities and Exchange Commission (the “SEC”) an Order Institution Public Administrative and Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1933, Sections 21C and 4C of the Securities Exchange Act of 1934, and Rule 102(e) of the Commission’s Rules of Practice, Making Findings, and Imposing Remedial Sanctions, and a Cease-and-Desist Order, Administrative Proceeding File No. 3-15952, against EFP Rotenberg, LLP (“Rotenberg”), and its former partner Nicholas R. Bottini, CPA (the “Order”);

WHEREAS, the Order concerns Rotenberg’s audit of the financial statements of Universal Travel Group, Inc., and imposes sanctions on Rotenberg;

WHEREAS, Plaintiffs intend to seek leave to file a Third Amended Complaint to account for the Order;

WHEREAS, the UTG Defendants take no position concerning Plaintiffs’ anticipated motion to seek leave to file a Third Amended Complaint though the UTG Defendants believe that any such amendment is likely futile;

WHEREAS, the UTG Defendants reserve the right to file a motion to dismiss and/or motion to strike any Third Amended Complaint if the Court grants Plaintiffs leave to file a Third Amended Complaint;

WHEREAS, briefing a motion to dismiss if the Court grants the motion for leave to amend, would cause the the parties to expend further resources ;

WHEREAS, the Parties believe a three month stay so that they may attempt to resolve this case is appropriate at this time;

NOW, THEREFORE, it is stipulated, subject to the Court's approval, that:

This action is STAYED until October 17, 2014, except that Plaintiffs may file their motion for leave to amend their complaint. Defendants need not respond to the motion to amend nor answer or otherwise respond to any Third Amended Complaint during the period of the STAY. *The currently pending motion to dismiss is administratively terminated, subject to reinstatement if and as appropriate.*
IT IS SO STIPULATED:

Dated: July 22, 2014

THE ROSEN LAW FIRM, P.A.

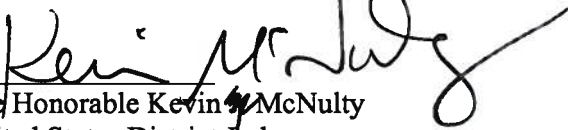
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Dated: July 22, 2014

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*Attorneys for Defendants Universal Travel Group,
Inc., Jiangping Jiang, and Jing Xie*

SO ORDERED: 7/23/2014


The Honorable Kevin McNulty
United States District Judge
